

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

|                             |   |               |
|-----------------------------|---|---------------|
| UNITED STATES OF AMERICA    | : | 1:21CR75-8    |
|                             | : |               |
| v.                          | : |               |
|                             | : |               |
| JAQUAN TYREE WILLIAMS-CLARK | : |               |
| also known as "Jay Jay"     | : |               |
| also known as "JJ"          | : |               |
| also known as "Psykho Jay"  | : |               |
| also known as "Demon"       | : | FACTUAL BASIS |

FACTUAL BASIS FOR A GUILTY PLEA

NOW COMES the United States of America, by and through Sandra J. Hairston, United States Attorney for the Middle District of North Carolina, and states that the factual basis for a guilty plea is as follows:

From in or about 2016 and continuing to March 2022, the defendant, Jaquan Tyree Williams-Clark, also known as Jay Jay, JJ, Psykho Jay, and Demon, was an associate and member of the Quixk Nation/Quixk Money Gang (hereinafter "QN/QMG") enterprise as set forth in the Indictment filed in 1:22CR75. The QN/QMG enterprise at all times relevant hereto has engaged in criminal conduct in Middle District of North Carolina and elsewhere. The QN/QMG enterprise has various members and associates, both known and unknown. QN/QMG's ranking leadership generally resides in Guilford County,

North Carolina and the enterprise's base of operations continues to be Greensboro, North Carolina.

Nine Trey Gangsters ("NTG," "9TRE," "9TREY," or "93") is a subset of the United Blood Nation ("UBN"). With branch operations in several eastern and southern states, including North Carolina, NTG participates in the same criminal activities, and functions with the same set of purposes, hierarchy, rules, operations, terminology, and symbolism, as does the overall UBN. NTG traffics in narcotics, and commits acts of violence, including murder and assault.

NTG is further broken down into subset groups or "lines" and uses a ranking system, referred to as a "lineup" or "line," often disguised with code names to label the leadership and ranking structure. A typical NTG line includes the following positions or lineup, in order of seniority:

- a. Godfather;
- b. High;
- c. Low;
- d. Five Star General;
- e. Four Star General;
- f. Three Star General;
- g. Two Star General;
- h. One Star General; and

i. Soldier or Scrap.

Within the Middle District of North Carolina, specifically, in the greater Greensboro region, multiple NTG lines exist and operate. These lines have been consolidated under the leadership of a single “High,” and are collectively known as the Quixk Nation (“QN”) or Quixk Money Gang (“QMG”) (hereinafter “QN/QMG”). QN/QMG has adopted and follows, with some exceptions, the general rules, regulations, and structure of NTG.

QN/QMG is broken down into various lines. These lines include, but are not limited to, the following:

- a. the Bapo Line;
- b. the Psykho Line;
- c. the Bully Line;
- d. the Roll Line;
- e. the Ugly Line; and
- f. the Wixked Line.

In addition to sharing the same leadership/ranking structure as NTG, within QN/QMG, women, sometimes called “First Ladies,” hold unique positions of authority. For example, a First Lady can be responsible for record keeping, covert communications, handling proceeds of illicit transactions, setting up narcotics transactions, and thwarting law enforcement detection by accepting responsibility for weapons and narcotics, and placing vehicles and

properties in her name.

Like NTG, QN/QMG is governed by a set of 31 rules, commonly known as “The 31.” The rules dictate behavioral norms and policies, as well as bar certain conduct, such as cooperating with law enforcement. The rules also set forth guidance for communications. The most common and accepted methods for communicating include the following:

- a. Facetoface meetings;
- b. social media and other internet-based platforms;
- c. cellular telephones; and
- d. smartphone applications.

As part of its operations, QN/QMG conducts meetings in order to manage gang business and to settle internal and external disputes. Members discuss dues, rules, organizational strategies such as narcotics trafficking, recruitment, and hierarchy.

To join QN/QMG, a prospective member must be introduced or sponsored by an existing QN/QMG, NTG, or UBN member or be introduced specifically by a high-ranking gang member, such as the “High” or a “Low.” Upon being accepted by QN/QMG leadership, the prospective member participates in an initiation ritual wherein he or she is physically beaten for 31 seconds by QN/QMG, NTG, or UBN members. This is commonly referred to as being “jumped in.” Thereafter, the newly minted QN/QMG member is provided with

gang materials and history, such as “The 31.” Alternatively, a prospective member can forego the physical beating and nonetheless still become a QN/QMG member if such person receives approval from a high-ranking QN/QMG member. This is commonly referred to as being “blessed in” or “flipped in.” Members of other UBN sets can “flip in” to QN/QMG and retain the rank they held in their previous gang, under certain circumstances.

Once admitted, new QN/QMG members are required to participate in criminal activities as directed by leadership. Such conduct includes, but is not limited to, narcotics distribution, firearms trafficking, property offenses, and acts of violence, including, but not limited to, murder and assault.

When required, funds are collected from members for the benefit of NTG and QN/QMG enterprise. Historically, dues were collected on the 31st of each month that ends in that date. These funds are commonly used to acquire cellular telephones for communication between members in and out of jail, to purchase narcotics for distribution, to procure firearms for use in violent crimes, to obtain the release of incarcerated members through bond payments, to send funds to the commissary accounts of incarcerated members, to provide loans to members, to provide funeral expenses of deceased members or associates, and for other gang-related purposes.

Like NTG, QN/QMG utilizes a variety of indicia to express allegiance to the gang, including, but not limited to, numbers, letters, colors, symbols,

tattoos, clothing, slogans, terminology, hand gestures, and greetings. These indicia are employed to identify members to one another, to distinguish members from both rival and allied groups, and to intimidate and threaten rivals and law enforcement. For example, QN/QMG members commonly use the number five, the five-pointed star, the five-pointed crown, and the numbers nine and three to denote their membership in QN/QMG.

In addition, QN/QMG members and associates wear or otherwise employ the color red, and commonly wear clothing of professional sports franchises who wear red as one of their team colors. Bandanas are also commonly worn by QN/QMG members to signify that they are gang members. The bandana can be worn in a variety of ways on the body, but the common denominator is that the bandana is red.

To thwart scrutiny from law enforcement and avoid detection from rival gangs, QN/QMG members and associates employ coded terms to communicate. For example, these terms include, but are not limited to, “Op” or “Ops,” which refers to a rival gang member or target of violence, and “food,” which has a dual meaning. If used in reference to violence, someone labeled as “food” or “being on a plate” refers to someone who is a target of violence. “Food” can also be a reference to different narcotics, depending on the context of the situation.

Similarly, QN/QMG members and associates employ certain written language, both in the form of code words and distinctive spelling, to denote

QN/QMG membership. For example, members will often replace the letter “c” with an “x” or “b” as a show of disrespect to the Crips, a historical UBN rival. For instance, QN/QMG members generally spell the word “wicked” as “wixked.”

To further distinguish itself, QN/QMG has adopted several different monikers, including, but not limited to Ugly Money Gang, or UMG; Paul Money Gang, or PMG; Bapo Route; Billy Bad Asses, or BBA; Big Xhip (Chip) Lineup; and variations thereof. Such identifiers are frequently found in the form of writings, clothing, apparel, jewelry, social media, music videos, and tattoos.

To obtain members, QN/QMG recruits within the local community, the surrounding areas, and the prison system. QN/QMG also frequently obtains members from rival gangs due to organizational disputes, incarceration, and financial motivations, among other reasons. This gang crossover and recruitment is also a source of ongoing disputes, and commonly results in acts of violence.

QN/QMG often recruits from, associates, and aligns forces with members of different groups for the common purpose of asserting QN/QMG authority, protecting narcotics distribution networks, protecting proceeds of narcotics distribution, and engaging in proactive and retaliatory acts of violence. One of the groups in the Greensboro, North Carolina area that historically aligned

and associated with QN/QMG is the Andrews Street Boys, also known by monikers such as “ASB” or “ASB 500” and the geographic area known as the “Dustbowl.” Some QN/QMG members are also members of ASB.

Since its founding in the Greensboro, North Carolina area in or about 2012, QN/QMG has consistently expanded to include members and associates who are not UBN NTG Bloods in the traditional sense, but nonetheless have status or rank within QN/QMG. These members and associates, though not UBN NTG Bloods, must still abide by the rules and regulations of QN/QMG or risk discipline in the form of excommunication, getting “kicked out of the whip,” or physical or monetary harm.

QN/QMG also has specific rival gangs that they compete with for status and power. These rivals can, at times, include other NTG or UBN subsets.

The defendant, Jaquan Tyree Williams-Clark, (hereinafter “Williams-Clark”) is a member in the QN/QMG enterprise. QN/QMG, including its leaders, members and associates constitute an “enterprise” as that term is defined under Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact that is engaged in and the activities of which affect interstate or foreign commerce. The criminal activities of the QN/QMG enterprise affects interstate commerce, through the acquisition, distribution, and sale of heroin, fentanyl, cocaine, cocaine base, marihuana, methamphetamine, and other controlled substances, interstate travel of



QN/QMG members to promote the affairs of the enterprise, and interstate money transfers.

Between approximately in or about 2016 to March 2022, Williams-Clark associated with, and was a member of, the QN/QMG enterprise, as described above, and he knowingly agreed that he or another person would conduct or participate, directly or indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity and that a conspirator would commit at least two acts of racketeering to include acts involving the distribution and sale of controlled substances and acts of violence.

Williams-Clark is a high-ranking member of the QN/QMG, formerly in the QN/QMG Psyxho Line, but currently in the Touch'em Up Entertainment (TUE) Line headed by unindicted QN/QMG coconspirator known as "Barlito." Williams-Clark's role in the enterprise is primarily that of a shooter, as discussed below. In a rap video, "Slang Iron," co-conspirator Jeremy Hasty, also known as Seno and Seno 2x, references Williams-Clark in a song by two nicknames, "Devil" and "Demon" and represents that Williams-Clark should be "free," or released from custody. On the date the video was uploaded to YouTube, on or about July 7, 2020, Williams Clark was in custody. According to a law enforcement database, Williams-Williams Clark was in continuous custody on charges of First-Degree Murder (later dismissed) between October 4, 2018 and August 29, 2020.

Williams-Clark had a prolific online social media presence. In summary, Williams-Clark discussed and displayed his NTG/QN/QMG membership and his ability to have access to firearms. His public Facebook profile, Tyree McKnight (HR Sosa), contains multiple pictures that show his membership and association with the QN/QMG enterprise and his proclivity toward possessing firearms. The following photographs are representative examples of those contained on the publicly available portion of that Facebook profile.

On or about May 5, 2021, Williams-Clark posted the photo below. Williams-Clark is in the center foreground and behind him is QN/QMG TUE line leader, D.W., also known as Barlito. Williams-Clark appears to be surrounded by gang members and other QN/QMG associates holding firearms.



On March 29, 2021, Williams-Clark posted a picture of himself with two QN/QMG TUE line members. Williams-Clark and another individual are wearing unique chains, with a gold snakehead, that are given to or purchased by TUE line members who have earned them for “putting in work” on behalf of the line and the QN/QMG enterprise generally. Williams-Clark appears to be holding an AK-47 style firearm without a stock.



At various times and in various posts, Williams-Clark appears in other posts with the same gold chain, other QN/QMG TUE line members, and firearms.



When Williams-Clark was a member of QN/QMG Psykho Line in or about 2016, he was even scolded by his superior for his prolific use of Facebook

to promote himself and the QN/QMG enterprise generally. On or about June 23, 2016, co-conspirator Kenneth Wise, also known as KG and Kenny, told Williams-Clark<sup>1</sup> to stop using Facebook as a medium of exchange for enterprise affairs: “And stop posting yo every move on fb you Im in the middle of a war delete all those statuses that got south side or Hampton.” The “south side” in High Point is home to a broad range of gang activity, and a recruiting area for QN/QMG. “Hampton” Park refers to a specific neighborhood in High Point where QN/QMG engaged rivals through the period of its existence.

Williams-Clark knowingly participated in the conduct of the affairs of the enterprise through a pattern of racketeering activity by committing, himself, at least two racketeering acts, which included participation in a narcotics conspiracy, possessing with the intent to distribute heroin, and the shooting of C.G. on August 21, 2019, described in more detail below.

QN/QMG engages in extensive drug trafficking. For example, in July 2018, deputies with the Guilford County Sheriff’s Office conducted a knock and talk at an apartment of a female associate of QN/QMG enterprise. The end result of the investigation yielded, among other items, 7.4 kilograms of heroin, 2.5 kilograms of fentanyl, a Tyvek suit, respirator, and a kilo press. QN/QMG “High” Darius King manufactured his heroin/fentanyl mixture at this location

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<sup>1</sup> In or about 2016, Williams-Clark used a different Facebook account and subscriber name, “Psykho Jay.”



between February 2018 and July 2018. Upon his association with QN/QMG, Williams-Clark sold and assisted in the sale of narcotics, primarily heroin, as a member of the QN/QMG enterprise.

### **QN/QMG Drug Activity & Firearms**

Williams-Clark was aware of, and participated in QN/QMG's substantial drug trafficking. This was a primary means of generating income for the enterprise and enhancing the power of the gang. In total, the amount of narcotics that was part of the conspiracy and foreseeable to Williams-Clark was at least one kilogram or more of a mixture and substance containing a detectible amount of heroin, a Schedule I controlled substance. On September 26, 2018, Williams-Clark accompanied fellow QN/QMG gang member Davorin White, a.k.a. "Frap," to a heroin deal where White sold approximately fourteen grams of heroin to a confidential source. During the deal, which occurred in the confidential source's car, FBI agents saw Williams-Clark conducting counter surveillance near the store where the deal occurred.

Beginning in January 2021, High Point Police Department (HPPD) Vice detectives began a controlled purchase operation specifically targeting Williams-Clark. All the buys were audio and video recorded and completed with a reliable source (used in prior HPPD/DEA investigations). On January 28, 2021, the source purchased 1.03 grams of suspected heroin from Williams-Clark. On April 21, 2021, the source purchased 2.67 grams of suspected heroin.

On May 27, 2021, the source purchased 10.16 grams of suspected heroin. On June 17, 2021, the source purchased 8.37 grams of suspected heroin.<sup>2</sup>

The HPPD detectives set up a buy-bust operation for July 14, 2021. An undercover HPPD Vice/Narcotics Detective set up the deal to purchase a quantity of heroin from Williams-Clark. Prior to the deal, HPPD officers conducting surveillance observed Williams-Clark as the front seat passenger in a white SUV while that car was traveling down Martin Luther King, Jr., Drive. Officers arranged to complete the deal at a local High Point gas station, The Pantry, and followed the white SUV into the parking area of that store. As HPPD officers approached to detain Williams-Clark, he attempted to discard three packages of suspected heroin before being apprehended by HPPD officers—one small baggie on the ground near the counter of the store (handed over to police by the store clerk) and two larger baggies in a trashcan beside the counter. Video surveillance from inside the store clearly shows Williams-Clark attempting to discard all the packages. Forensic chemical analysis of one

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<sup>2</sup> Forensic chemical analysis conducted by the North Carolina State Crime lab later revealed that among these initial controlled purchases, only the substance from the January 28, 2021 contained a detectable amount of a controlled substance—.65 grams of fentanyl. The HPPD officers involved believed the source purchased heroin during the controlled purchase operations that occurred between April and June 2021 based on the source's negotiation of the deals, the price of the drugs purchased with police funds, their experience with Williams-Clark during the first buy, and the appearance/consistency of the substances turned over to police after the deals. During the third and fourth buys, on May 27 and June 17, respectively, Williams-Clark's face is clearly captured on the clandestine recording device HPPD officers provided to the source.

the larger of the two baggies Williams-Clark discarded in the trashcan showed that it contained 31.77 grams of a mixture of fentanyl and heroin. A slightly smaller baggie contained 25.30 grams of a lab confirmed mixture of fentanyl and fentanyl precursor, ANPP. The smallest of the three baggies, provided by the store clerk to arresting HPPD officers, contained a 5.13-gram quantity of a heroin and fentanyl mixture.

Officers then searched the white SUV. In the car, officers found a Taurus GZC 9mm handgun and a Glock 22 40mm handgun with an extended magazine. Both handguns under the front passenger seat where officers saw Williams-Clark sitting. The Taurus 9mm was stolen. Preliminary examination of the Glock 22 .40 caliber handgun revealed that it had a “Glock Switch” on the back of the slide making the weapon fully automatic.

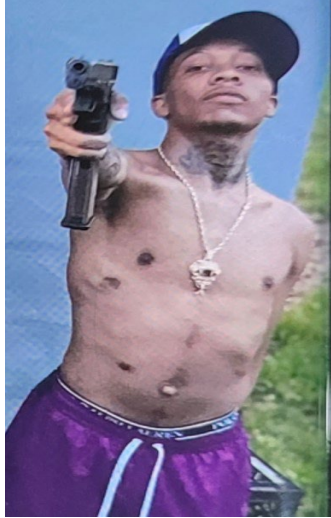
The Bureau of Alcohol Tobacco Firearms and Explosives (ATFE) Technical Branch conducted testing and analysis on the Glock. That analysis revealed that the Glock .22 .40 caliber handgun was outfitted with a conversion device, commonly known as “Glock Switch.” According to the ATFE Technical Report, the “switch” has two positions and a push-button selector. The operator can choose between semi-automatic and automatic functions. When the ATFE Firearms Enforcement Officer James Barlow tested the weapon, he found that the Glock 22 .40 caliber pistol functioned only as an automatic weapon—firing multiple rounds of test ammunition with the single pull of the trigger,



regardless of whether the “Glock Switch” on the weapon was turned to the semi-automatic or automatic setting. Williams-Clark well knew of the Glock 22 .40 caliber’s capabilities as a machinegun. On the day of his arrest by HPPD, he began making phone calls to a woman, later identified as D.S. In multiple calls, Williams indicated he hoped that the police would not find out about the firearm with a “dirt bike switch,” a colloquial phrase used to reference the “Glock Switch,” which made the Glock 22 .40 caliber handgun function as a machinegun. In a later call, Williams-Clark admits, “I got caught with the dirt bike switch.”

### **Shootings**

Confidential sources and cooperating witnesses have stated that Williams-Clark is responsible for voluminous shootings in Greensboro and High Point over the years. Below is a photograph of Williams-Clark’s Instagram account showing him pointing a firearm and wearing QN/QMG TUE snake chain previously referenced:



On August 21, 2016, Williams-Clark shot into a car driven by victim C.G. She was hit by two gunshots in her hand and in her right thigh. C.G. identified “JJ from High Point” as the person who shot her. At the time, C.G. was dating M.W., a QN/QMG rival G-Shine/Gun Gang Mafia gang member. C.G. had also been a dispute with another young woman, B.R., who was known to associate with “JJ” and others from “High Point.” M.W.’s associates had been involved in different dispute with Williams-Clark the night before C.G.’s shooting at a party on the 900 block of West Terrell Street in Greensboro. M.W. was in the car with C.G. when Williams-Clark shot into her car. C.G. was driving down Rocky Knoll Road in Greensboro to evade a mob of individuals that had attacked her car while driving through in a parking lot on Raddleman Road. C.G. identified “JJ” as the person who shot at her from a silver sedan while driving down Rocky Knoll. Williams-Clark was approximately five feet away

from C.G. when he leaned out of a silver sedan and began firing in C.G.'s direction.

Similarly, in the early morning of April 10, 2021, Williams-Clark, along with two unindicted QN/QMG TUE line members, one of whom is known as "Nut," engaged in a "shootout" with unidentified individuals while leaving the Arabian Nights Hookah Lounge. Just after two in the morning, GPD officers responded to a report of injuries near Exit 68 on I-40 West. There, a GPD officer found two victims suffering from gunshot wounds. The three women were standing outside a silver Honda HRV Sport. Victim L.S. was shot in the lower right leg. Victim L.F. sustained injuries to her right hand. Both victims told police that they had been shot while attempting to leave Arabian Nights Hookah Lounge on the Spring Garden Street. Officers responded there and found six .223 caliber casing in the roadway near the intersection of Pomona Drive and Spring Garden, just north of the night club.

A GPD Detective began collecting evidence to identify the shooters in the dark colored SUV. Surveillance footage from Arabian Nights and other businesses in the area showed a dark colored sedan following a silver SUV out of the parking lot of Arabian Nights and shooting into it near the intersection of Spring Garden and Pomona. Surveillance footage from outside the Arabian Nights put Williams-Clark at the scene before the shooting and inside the club.

On or about April 18, 2021, Williams-Clark and “Nut” were involved in a shooting and car wreck after leaving Arabian Nights Hooka Lounge.. After the shooting, GPD officers seized a Del-Ton DTI -15 .223 caliber rifle left at the scene of the car wreck where they also observed Williams-Clark and “Nut” with various injuries. Ballistics analyses returned by the National Integrated Ballistic Information Network (NIBIN) showed that the Del-Ton .223 rifle was the firearm fired at the scene of the Arabian Nights shooting from April 10, 2022. Thereafter, investigating officers completed search warrants for Williams-Clark’s Facebook account, and later, two Apple iPhones Williams-Clark had on him when he was arrested on July 16, 2021, by HPPD in the drug/machinegun investigation noted above. Analysis of one of the phone numbers by the Federal Bureau of Investigation Cellular Analysis Survey Team (CAST) tracks Williams-Clark’s call detail records for number (336) 653-1497<sup>3</sup> in the area of the Arabian Nights shooting on April 10, 2021.

Search warrants completed on Williams-Clark’s cell phones and his current Facebook account, Tyree McKnight (HR Sosa), User No. 100034913019840, contain numerous references to the shooting perpetrated by Williams-Clark on April 10 outside Arabian Nights. For example, in text

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<sup>3</sup> Williams-Clark provided this cell phone contact number, (336) 653-1497, to other Facebook users from his account, Tyree McKnight (HR Sosa), in private message exchanges.

message exchange with between (336) 653-1497 (Williams-Clark) and a contact named “Nae” at 2:09 a.m. on April 10, 2021, Williams-Clark replies to “Nae’s” repeated attempts to contact him by saying, “Bro get the fuck off my phone with this bullshit tf I just got in full blow shootout tf.” A 2:10 a.m. Williams-Clark engages another unnamed contact and stated, “Just got in a shootout.”

In this same iPhone, a GPD detective found: (1) images and video that depicted the following: (1) a Crime Stoppers flyer issued by Greensboro Police in reference to a shooting at/near the Arabian Nights Hookah Lounge (IMG\_3762.jpeg and IMG\_2217.jpeg), (2) a video that depicts Williams-Clark and two QN/QMG associates wearing what appears to be the same clothing they were observed wearing on surveillance video at the Arabian Nights Hookah Lounge; and (3) a video of a firearm that appears to be the same Del-Ton firearm recovered from the shooting scene on April 18th.

This the 19th day of August, 2022.

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CERTIFICATE OF SERVICE

I hereby certify that on August 19, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following: Thomas K. Maher, Esq.

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